

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re: ) Case No. 08-35653-KRH  
CIRCUIT CITY STORES, INC., ET AL., )  
Debtors ) Chapter 11 (Jointly administered)  
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**RULE 2019 STATEMENT OF KING & SPALDING LLP**

NOW COMES KING & SPALDING LLP and submits this verified statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, stating as follows:

**1. Names and Addresses of the Creditors and Interested Parties Represented by King & Spalding LLP**

King & Spalding LLP represents the following creditors and parties in interest in this Chapter 11 case (the “Creditors” or “Clients”):

Applied Predictive Technologies, Inc.  
901 North Stuart Street, Suite 1100  
Arlington, VA 22203

KPMG LLP  
2100 Dominion Tower  
999 Waterside Dr.  
Norfolk, VA 23510-3310

Mitsubishi Digital Electronics America, Inc.  
9351 Jeronimo Road  
Irvine, CA 92618-1904

Mitsubishi Electric & Electronics USA, Inc.  
5665 Plaza Drive  
Cypress, CA 90630-0007

**2. Nature and Amount of the Claims and Time of Acquisition Thereof**

(a) Applied Predictive Technologies, Inc. (“Applied”), holds certain claims against Circuit City Stores, Inc. (the “Debtor”; collectively with the joint administration parties, the “Debtors”), in liquidated amounts for software sold and services provided to the Debtor both before and after the filing of its bankruptcy petition. Applied holds \$75,000.00 in claims against the Debtor.

(b) KPMG LLP (“KPMG”) currently serves as auditors and tax consultants to the Debtors pursuant to the Bankruptcy Court’s Order Authorizing Debtors to Retain and Employ KPMG LLP as Auditors and Tax Consultants Effective as of the Petition Date [Dkt. No. 1278]. KPMG does not currently hold any prepetition claims against the Debtors, as KPMG waived its prepetition claims against the Debtors pursuant to the Declaration of Christos M. Xystros that was attached to the Debtors’ Application for Order Under Bankruptcy Code Sections 105(a), 327(a), 328 and 1107 and Bankruptcy Rule 2014(a), Authorizing the Employment and Retention of KPMG LLP as Independent Auditors and Tax Consultants to the Debtors Effective as of the Petition Date [Dkt. No. 956]. KPMG, however, is a party of interest to the Debtors’ bankruptcy.

(c) Mitsubishi Digital Electronics America, Inc. (“MDEA”), holds certain claims against Circuit City Stores, Inc. (the “Debtor”; collectively with the joint administration parties, the “Debtors”), in liquidated amounts for electronic goods sold to the Debtor in the several months prior to the Debtor’s filing of its bankruptcy petition. MDEA holds approximately \$15,258,077.65 in claims against the Debtor.

(d) Mitsubishi Electric & Electronics USA, Inc., does not currently hold any prepetition claims against the Debtors but is a party of interest to the Debtors’ bankruptcy.

**3. Pertinent Facts and Circumstances in Connection with the Employment of King & Spalding LLP**

King & Spalding LLP has been asked and has agreed to represent the Clients in connection with the Debtors' bankruptcy case. King & Spalding LLP's professional services were requested by each individual Client after the commencement of the Debtors' bankruptcy case. Each of the Clients consents to King & Spalding LLP's simultaneous representation of the other, and each has waived any conflict that might exist or be alleged to exist as a result of these simultaneous representations.

**4. Amount of Claims Owned by King & Spalding LLP**

Prior to the Debtor's Chapter 11 bankruptcy case, King & Spalding LLP served as counsel to the Debtor. King & Spalding LLP holds certain claims against the Debtor in liquidated amounts for legal services provided to, and expenses incurred on behalf of, the Debtor before the filing of its bankruptcy petition. King & Spalding LLP holds a \$72,340.22 claim against the Debtor or one of its affiliates.

**5. Verification**

The undersigned, H. Slayton H. Dabney, Jr., declares under penalty of perjury that I have read the foregoing and that it is true and correct to the best of my knowledge, information, and belief.

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This 3rd of February, 2009.

Respectfully submitted,

KING & SPALDING

/s/ H. Slayton H. Dabney, Jr.

H. Slayton H. Dabney, Jr.

Virginia Bar No. 14145

King & Spalding LLP

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